

## **REMARKS**

Claims 1-27 are pending in the application. Claims 1-27 were rejected. An objection was made to the Abstract of the Disclosure. By the above amendment, the Abstract has been amended. In addition, claims 1, 3, 4, 7, 16 and 23 have been amended and claim 2 has been canceled without prejudice. The Examiner's reconsideration of the claim rejections and specification objection is respectfully requested in view of the above amendments and following remarks.

### **Specification Amendment**

An objection was made to the Abstract of the Disclosure of Applicant's specification as being too long. The Abstract has been amended. The withdrawal of the specification objection is thus respectfully requested.

### **Claim Rejections Under 35 U.S.C. § 102**

Claims 1-6, 8-18, 20-25 and 27 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,519,686 to Woodring et al., for the reasons set forth on page 2-7 of the Office Action. At the very minimum, claims 1, 16 and 23 are believed to be patentably distinct and patentable over Woodring.

In general, claims 1, 16 and 23 are directed to systems and methods for sharing data between multiple consumers. Data that is received from a data source in a first queue. The data stored in the first queue is shared between a plurality of consumers. For example, as shown in Fig. 5 of Applicants' specification, a data source may comprise a consumer (303) that stores data in a queue (305) which is shared by a plurality of consumers (307) and (307). A scheduler

manages the storage and consumption of the data in the first queue, where managing comprises *controlling the data source and the plurality of consumers to control the amount of data stored in and consumed from the first queue*. Advantageously, by controlling the data source and the plurality of consumers to control the amount of data stored in and consumed from the first queue, the systems and methods of claims 1, 16 and 23 provide a mechanism for efficiently balancing consumer load (e.g., speech engines) and managing the consumption of data from buffers.

Although Woodring discloses a shared memory system that allows a plurality of consumers to share data stored in a buffer by a producer, the Woodring system does not disclose or suggest a mechanism that enables controlling the data source and the plurality of consumers to control the amount of data stored in and consumed from the first queue, as essentially claimed in claims 1, 16 and 23. Woodring discloses in Fig. 4 and IPC channel (330) that is associated with a single producer and a plurality of consumers, and which acts as a conduit for sending data from the single producer to the plurality of consumers (Col. 6, lines 62-64). The IPC (330) comprises a storage manager (350) (which Examiner equates as the claimed “scheduler”) that manages the storage buffer and the management data structure (Col. 7, lines 19-21). Woodring does not disclose or suggest that the storage manager (350) actually *controls the data source* (producer) and *the plurality of consumers to control the amount of data stored in and consumed from the first queue* (buffer), as claimed. Indeed, Woodring discloses that the producer comprises mechanisms for managing the data stream between the producer and consumers (see, e.g., Col. 6, lines 18-23).

Accordingly, for at least the reasons given above, claims 1, 16 and 23 are believed to be patentably distinct and patentable over Woodring. Further, since claims 3-6 and 8-15 depend

from claim 1, claims 17-18 and 20-22 depend from claim 16, and claims 24-25 and 27 depend from claim 23, such claims are believed to be patentably distinct and patentable over Woodring *at least* for the reasons given above for respective base claims 1, 16 and 23.

Accordingly, the withdrawal of all the rejections under 35 U.S.C. § 102(e) is respectfully requested.

**Claim Rejections Under 35 U.S.C. § 103**

Claims 7, 19 and 26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Woodring in further view of U.S. Patent No. 4,916,658 to Lee. The 103 rejections are based, in part, on the contention that Woodring discloses each of the elements of claims 1, 16 and 23 from which these claims depend. As demonstrated above, however, it is respectfully submitted that Woodring does not teach or suggest the elements of claims 1, 16 and 23. Therefore, the combination is legally deficient to establish a *prima facie* case of obviousness against 7, 19 and 26 because, at the very minimum, Woodring fails to teach or suggest elements of the base claims 1, 16 and 23. Therefore, the withdrawal of the rejections under 35 U.S.C. § 103(a) is respectfully requested.

Respectfully submitted,



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